



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JUN 27 2012

Mr. John F. Buckley, Senior Project Manager
Design and Construction Division, Public Buildings Service
New England Region, U.S. General Services Administration
10 Causeway Street, 11th Floor
Boston, Massachusetts 02222

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c)
and § 761.79(h)
John F. Kennedy Federal Building
Boston, Massachusetts

Dear Mr. Buckley:

This is in response to the April 13, 2012 request by the U.S. General Services Administration (GSA) to modify its PCB abatement plan for the John F. Kennedy Federal Building located at 15 New Sudbury Street in Boston, Massachusetts (the Site). GSA has submitted the modification request in accordance with Condition 16 of the *March 21, 2012 PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c) and § 761.79(h)* (Approval).

GSA is proposing to incorporate cleanup of PCB-contaminated building materials associated with twenty-six (26) ground-level windows on the low-rise portion of the building and with certain windows and doors in the inner courtyard of the low-rise portion of the Site.

Additional information on the proposed modification was provided dated May 1, 2012 (Clarification on modification); May 23, 2012 (Response to EPA Comments); June 22, 2012 (Response to EPA comments #2); and June 26, 2012 (courtyard window cross-sections).

GSA's modification for inclusion of the ground-level windows and inner courtyard windows and doors includes the following activities:

➤ *26 Ground-Level Windows*

- Remove PCB caulk and ground-level windows and dispose of as a *PCB bulk product waste*;

- Remove mortar and insulation cavity materials from the ground-level windows and dispose as a *PCB remediation waste*;
- Decontaminate granite wall surfaces around ground-level windows to less than or equal to (\leq) $10 \mu\text{g}/100 \text{ cm}^2$, except for the playground area where the granite wall surfaces will be decontaminated to $\leq 1 \mu\text{g}/100 \text{ cm}^2$; and,
- Conduct post-abatement sampling to confirm that the PCB cleanup standard for *non-porous surfaces* has been met.

➤ *Inner Courtyard Windows and Doors*

- Remove PCB caulk and sealants and window and door metal frames and glass, and dispose as a *PCB bulk product waste*;
- Decontaminate *non-porous surfaces* (i.e., metal window frames and potentially doorway metal thresholds on the first floor (*high occupancy area*)) that will remain in place to $\leq 10 \mu\text{g}/100 \text{ cm}^2$;
- Decontaminate building *porous surfaces* (i.e., concrete) to achieve a PCB cleanup standard of $\leq 25 \text{ ppm}$ in *low occupancy areas*;
- Remove dark gray stone pavers and first row of light gray masonry pavers located on the exterior of the doorway and the doorway metal thresholds and dispose as a $\geq 50 \text{ ppm}$ *PCB remediation waste*; and,
- Post-abatement sampling to confirm that the PCB *low occupancy area* cleanup standard or PCB *high occupancy area* cleanup standard had been met.

Based on the EPA's review of the information provided, the proposed activities are consistent with the requirements under §§ 761.61 and 761.62 for decontamination and/or disposal of *PCB remediation waste* and *PCB bulk product waste*. These activities also are consistent with work activities authorized under the Approval. Thus, EPA is approving your modification request with the following conditions:

1. Unless otherwise modified by this letter, GSA must comply with all terms and conditions specified in its Approval, including submittal of the documents required under Attachment 1, Conditions 9 through 11 for this specific abatement work, unless otherwise modified;
2. Post-abatement indoor air sampling shall be conducted as described in April 13, 2012 and June 22, 2012 submittals to evaluate the effect of the implemented abatement on indoor air PCB concentrations;

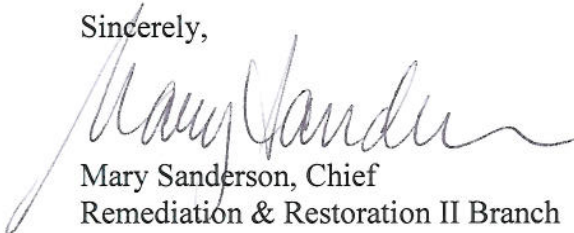
3. The modification approved by this letter shall be included in the final completion report and the notation on the deed as required under Conditions 21 and 22 of the Approval, respectively;
4. The deed notation shall include language on restrictions pertaining to any future work at the Site where caulk or other sealant types will be disturbed during renovation or other construction activities, including but not limited to building facades, windows, doors, and curtain walls, and expansion joints; and,
5. Other than the windows located along the day-care center on the ground-level, this modification Approval **does not** address any PCB contamination associated with the day-care center, including the playground area.

Under the Approval and this modification approval, EPA is reserving its right to require additional investigation or mitigation measures should the results of the abatement work that has been conducted or that will be conducted indicate that an unreasonable risk to building occupants and/or building users is present at the Site. With respect to the day-care center and playground, GSA shall be required to submit its plan to address these areas.

Required submittals and/or questions regarding this letter should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527 Facsimile: (617) 918-0527

Sincerely,



Mary Sanderson, Chief
Remediation & Restoration II Branch

cc Daniel White, PG, ATC Associates, Inc.
MassDEP, Boston
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